

1 Mark R. Thierman, Nev. Bar No. 8285
mark@thiermanbuck.com
2 Joshua D. Buck, Nev. Bar No. 12187
josh@thiermanbuck.com
3 Leah L. Jones, Nev. Bar No. 13161
leah@thiermanbuck.com
4 THIERMAN BUCK LLP
7287 Lakeside Drive
5 Reno, NV 89511
Tel. (775) 284-1500
6 Fax. (775) 703-5027

7 Christian Gabroy, Nev. Bar No. 8805
christian@gabroy.com
8 Kaine Messer, Nev. Bar No. 14240
kmesser@gabroy.com
9 GABROY LAW OFFICES
The District at Green Valley Ranch
10 170 S. Green Valley Pkwy, Suite 280
Henderson, NV 89012
11 Tel. (702) 259-7777
Fax. (702) 259-7704

12 *Attorneys for Plaintiff Alexis Harris*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 ALEXIS HARRIS, on behalf of herself
16 and all others similarly situated,

17 Plaintiff,

18 vs.

19 HAT WORLD, INC. d/b/a and a/k/a LIDS
20 LOCKER ROOM; DOES 1 through 50;
inclusive,

21 Defendant(s).

Case No: 2:19-cv-00882-JAD-GWF

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE PROPOSED
DISCOVERY PLAN**

(Second Request)

22 **STIPULATION AND ORDER TO EXTEND TIME**
23 **TO FILE PROPOSED DISCOVERY PLAN**

24 The parties, by and through their respective counsel of record, submit the
25 following Stipulation And Order To Extend Time To File Proposed Discovery Plan.

26 1. On May 24, 2019, Defendant Hat World Inc. d/b/a and a/k/a Lids Locker
27 Room ("Defendant") removed this matter to federal court. ECF No. 1, p. 1.

2. On May 31, 2019, Defendant filed its Answer to Plaintiff's Class Action Complaint. ECF No. 7, p. 1. Such Answer declared that Defendant "intends to file a motion to compel arbitration" in this matter. *Id.* at p. 2, line 20.

3. On July 9, 2019, Defendant's counsel presented to Plaintiff's counsel a courtesy copy of the purported arbitration agreement upon which Defendant intends to move to compel arbitration

4. The parties proposed discovery plan was initially due on July 15, 2019. ECF No. 7. On July 10, 2019, the parties requested a period of twenty-one additional days up to and including August 5, 2019 to file a proposed discovery plan and scheduling order should the parties not achieve agreement on whether this matter should be submitted to arbitration. The Court granted the parties' request in an order dated July 11, 2019. ECF No. 10.

5. The parties proposed discovery plan is currently due on August 5, 2019. ECF No. 11.

6. Plaintiff's counsel is currently reviewing the purported arbitration agreement. Following such review, the parties will meet and confer in good faith to explore the possibility of mutually submitting to arbitration, the status of the matter, and any other potential threshold issues.

7. The parties request a period of twenty-one additional days up to and including August 26, 2019 to file a proposed discovery plan and scheduling order should the parties not achieve agreement on whether this matter should be submitted to arbitration.

8. This request is not sought for any improper purpose or other reason of delay. Rather, it is sought only conserve expenditures and resources of this Court while the parties engage in such good faith discussions which may result in the avoidance of costly and potentially unnecessary motion practice.

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Wherefore, the parties respectfully request a period of twenty-one additional days up to and including August 26, 2019 to file a proposed discovery plan and scheduling order should the parties not achieve agreement on whether this matter should be submitted to arbitration.

Respectfully submitted,

Dated this 5th day of August 2019.

Dated this 5th day of August 2019.

/s/ Christian Gabroy

Christian Gabroy
Nev. Bar No. 8805
Kaine Messer
Nev. Bar. No. 14240
GABROY LAW OFFICES
170 S. Green Valley Parkway, Ste 280
Henderson, NV 89012
Tel: (702) 259-7777
Fax: (702) 259-7704

Mark R. Thierman
Nev. Bar No. 8285
Joshua D. Buck,
Nev. Bar No. 12187
Leah L. Jones,
Nev. Bar No. 13161
THIERMAN BUCK LLP
7287 Lakeside Drive
Reno, NV 89511
Tel: (775) 284-1500
Fax: (775) 703-5027

Attorneys for Plaintiff

/s/ Robert McCoy

Robert McCoy
Nev. Bar No. 9121
Joni Jamison.
Nev. Bar No. 11614
KAEMPFER CROWELL
1980 Festival Plaza Drive, Suite 650
Las Vegas, NV 89135
Tel: (702) 792-7000
Fax: (702) 796-7181

Cheryl A. Sabnis
Pro hac vice application forthcoming
KING & SPALDING LLP
101 Second Street, Suite 2300
San Francisco, CA 94105
Tel: (415) 318-1200
Fax: (415) 318-1300

Attorneys for Defendant

IT IS SO ORDERED.

August 23, 2019

Date


UNITED STATES MAGISTRATE JUDGE